

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BEATRICE KELLY and
RALPH KELLY,

Plaintiffs,

v.

Case No. 2:18-cv-10982
Hon. Gershwin A. Drain
Magistrate Judge R. Steven Whalen

METROPOLITAN GROUP
PROPERTY AND CASUALTY
INSURANCE COMPANY,

Defendant.

MELAMED, DAILEY, LEVITT
& MILANOWSKI, P.C.
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PLAINTIFFS' WITNESS LIST

NOW COME Plaintiffs, Beatrice Kelly and Ralph Kelly, by and through their attorneys, Melamed, Dailey, Levitt & Milanowski, P.C., and hereby offer the following list of witnesses they may call at trial:

1. Beatrice Kelly;
2. Ralph Kelly;

3. Melaundra Floyd;
4. Cassandra Floyd;
5. Chris Holt;
6. Christina Schlack;
7. friends, family members and neighbors of Plaintiffs who may have information related to this matter, whose identities are unknown at this time;
8. employees, agents, record custodians and representatives of Professional Public Adjuster Services, LLC including, but not limited to:
 - a. Donald J. Tabron;
9. employees, agents, records custodians and representatives of Metropolitan Group Property and Casualty Insurance Company, including, but not limited to:
 - a. Judy Bird;
 - b. Dennis Bagozzi;
 - c. John Baumeister;
 - d. Debra Benvenuto;
 - e. Robert Bodoni;
 - f. Kimberly Burns;
 - g. Lisa Doherty;
 - h. Amy Espinal;
 - i. Jeffrey Hamrick;
 - j. Christopher M. Howard;
 - k. Jennifer Kent;
 - l. Krissy Montella;
 - m. Ann Scandiffio;
 - n. Jim Nickle;
 - o. Dan Reist;
 - p. Cheryl Lockett;

10. employees, agents, records custodians and representatives of the Herndon & Associates, including, but not limited to:
 - a. Jeffrey Terski;
11. employees, agents, records custodians and representatives of the City of Eastpointe Fire Department, including, but not limited to:
 - a. Fire Marshal Larry Folkerts;
12. employees, agents, records custodians and representatives of the City of Eastpointe Building Department;
13. employees, agents, records custodians and representatives of the City of Eastpointe Water Department;
14. employees, agents, records custodians and representatives of the Equian/Trover Solutions, Inc., including, but not limited to:
 - a. Suzanne Harper;
15. employees, agents, records custodians and representatives of:
 - a. Fifth Third Bank;
 - b. Eagleview;
 - c. Enservio;
 - d. SubroTech, LLC;
 - e. ISO/Claim Search;
 - f. Accurint;
 - g. Ocwen Loan Servicing, LLC;
 - h. DTE Energy;
 - i. Key Bank;
 - j. Information Providers, Inc.

16. persons identified or described in the course of examinations under oath, recorded statements, depositions or other discovery and investigation;
17. persons identified or described in Defendant's Rule 26 disclosures, witness lists and/or exhibit lists;
18. necessary rebuttal witnesses;
19. persons who may have witnessed this incident or claim-related events, but who are unknown at this time; and
20. Persons identified or described in records and/or documents produced by Defendant in Rule 26 disclosures and in reply to Plaintiffs' requests for production of documents.

Plaintiffs reserve the right to amend this witness list as additional witnesses become known up to the time of trial.

Respectfully submitted,

MELAMED, DAILEY, LEVITT
& MILANOWSKI, P.C.

/s/Joseph L. Milanowski
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Dated: June 29, 2018

CERTIFICATE OF SERVICE

I, Lisa M. Wilson, certify that on June 29, 2018 I electronically filed the foregoing paper with the CM/ECF System for the U. S. District Court, Eastern District of Michigan, Southern Division, which will effectuate service of the same upon all attorneys of record.

I declare that the statements above are true to the best of my information, knowledge and belief.

/s/Lisa M. Wilson

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